

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
VICTORIA DIVISION

DONNIE EUGENE AIKINS, ET)

AL)

Plaintiffs)

vs.) CASE NO. 6:13-cv-00054

WARRIOR ENERGY SERVICES)

CORP.)

Defendant)

ORAL DEPOSITION
RANDALL JAMES NEWELL
May 2, 2014

ORAL DEPOSITION OF RANDALL JAMES NEWELL,
produced as a witness at the instance of the
Defendant and duly sworn, was taken in the
above-styled and numbered cause on the 2nd day of
May, 2014, from 10:23 a.m. to 12:57 p.m., before
Vickie G. Hildebrandt, Certified Shorthand Reporter
in and for the State of Texas, reported by
computerized stenotype machine at the offices of
Locke Lord LLP, 600 Travis, Suite 2800, Houston,
Texas, pursuant to the Federal Rules of Civil
Procedure and the provisions stated on the record or
attached hereto.

APPEARANCES

FOR PLAINTIFFS:

Mr. Clark Woodson, III
Attorney at Law
601 East Myrtle
Angleton, Texas 77515

FOR DEFENDANT:

Mr. J. Michael Rose
Locke Lord LLP
600 Travis, Suite 2800
Houston, Texas 77002

1 behind it?

2 A. Whenever we would move places, either the
3 Buffalo or the heater.

4 Q. What's the Buffalo?

5 A. Fuel Buffalo, like 600-gallon tank.

6 Q. And that would be on a trailer that's towed
7 behind the pickup?

8 A. Yes, sir.

9 Q. Is that pretty common for you to have a
10 trailer behind that pickup?

11 A. Yes.

12 Q. On the -- when you're working jobs?

13 A. Moving from, yeah, from location to
14 location.

15 Q. You say most times you had one?

16 A. On location, yes.

17 Q. Do you have any idea what those trailers
18 would have weighed?

19 A. No idea.

20 Q. So the one you said hauled about -- had
21 capacity of 600 -- you say 600 gallons?

22 A. 600 gallons, yeah.

23 Q. Okay. And then the other thing that you
24 would tow on it was a heater?

25 A. Yes, sir.

1 A. The direction, everything with how flowback
2 would be ran, how things would be set up and
3 everything else was pretty hand-in-hand with how the
4 coil operator, how it was more convenient for them,
5 light plans being set up, not blinding their eyes,
6 heaters being set up, where the fuel Buffalo went
7 that would be convenient for the truck to get in
8 there.

9 Q. Is that fuel Buffalo, is that that
10 600-gallon thing you were talking about?

11 A. Yeah.

12 Q. It was pulled on a trailer?

13 A. Yeah, it would be parked next to the fluid
14 pump because it had the biggest tanks on it and then
15 the slip tank or the pickup would drive around and
16 fill up the slip tank and then fill up the equipment,
17 back and forth, and then whenever we didn't have the
18 fuel Buffalo, we'd have to make trips into town and
19 fill up. I think the slip tank is 80 gallons or 60
20 gallons or something, but we'd have to make many
21 trips out there.

22 Q. Did you do that?

23 A. I have, yes.

24 Q. How frequently?

25 A. Depending on where we're at, I'd say three

1 I declare under penalty of perjury that the
2 foregoing is true and correct.
3
4

5 RANDALL JAMES NEWELL
6
7

8 SUBSCRIBED AND SWORN TO BEFORE ME, the
9 undersigned authority, by the witness, RANDALL JAMES
10 NEWELL, on this the day of ,
11 .
12
13

14 NOTARY PUBLIC IN AND FOR
15 THE STATE OF
16

17 My Commission Expires:
18
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25

1 STATE OF TEXAS
2 COUNTY OF HARRIS
3

4 REPORTER'S CERTIFICATE
5 ORAL DEPOSITION OF RANDALL JAMES NEWELL
6 May 2, 2014
7

8 I, the undersigned Certified Shorthand Reporter
9 in and for the State of Texas, certify that the facts
10 stated in the foregoing pages are true and correct.

11 I further certify that I am neither attorney or
12 counsel for, related to, nor employed by any parties
13 to the action in which this testimony is taken and,
14 further, that I am not a relative or employee of any
15 counsel employed by the parties hereto or financially
16 interested in the action.

17 SUBSCRIBED AND SWORN TO under my hand and seal
18 of office on this the day of ,
19 .
20
21

22 Vickie G. Hildebrandt, CSR
Texas CSR 1363
23 Expiration: 12/31/15
STRATOS LEGAL SERVICES, LP
24 Firm Registration No. 484
4295 San Felipe, Suite 125
25 Houston, Texas 77027